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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case, No.
19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**STIPULATION BY AND BETWEEN
REORGANIZED DEBTORS AND
CHEVRON PIPE LINE COMPANY TO SET
ASIDE ORDER DISALLOWING PROOF OF
CLAIM NO. 55769**

[No Hearing Requested]

1 PG&E Corporation and Pacific Gas and Electric Company, as debtor and debtor in possession
2 (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases
3 (the “**Chapter 11 Cases**”), on the one hand, and the Chevron Pipe Line Company (“**Chevron**”), on the
4 other hand, by and through their respective counsel, hereby submit this stipulation (the “**Stipulation**”)
5 for an Order approving the Parties’ (as defined below) agreement to set aside the order disallowing and
6 expunging proof of claim number 55769 (the “**Proof of Claim**”). The Reorganized Debtors and Chevron
7 are referred to in this Stipulation collectively as the “**Parties**,” and each as a “**Party**.” The Parties hereby
8 stipulate and agree as follows:

9 **RECITALS**

10 A. On January 29, 2019, the Debtors commenced the Chapter 11 Cases in the United States
11 Bankruptcy Court for the Northern District of California (the “**Bankruptcy Court**”).

12 B. On July 1, 2019, the Court entered the *Order Pursuant to 11 U.S.C. §§ 502(b)(9) and*
13 *105(a), Fed. R. Bankr. P. 2002, 3003(c)(3), 5005, and 9007, and L.B.R. 3003-1 (I) Establishing*
14 *Deadline for Filing Proofs of Claim, (II) Establishing the Form and Manner of Notice Thereof, and*
15 *(III) Approving Procedures for Providing Notice of Bar Date and Other Information to All Creditors*
16 *and Potential Creditors* [Docket No. 2806] (the “**Bar Date Order**”). The Bar Date Order set October
17 21, 2019 at 5:00 p.m. Pacific Time (the “**Bar Date**”) as the deadline to file all proofs of claim with
18 respect to any prepetition claim (as defined in section 101(5) of the Bankruptcy Code) against either of
19 the Debtors.

20 C. Chevron timely filed the Proof of Claim asserting certain claims relating to loss
21 incurred by Chevron at a Chevron gas pipeline valve junction as a result of a brush fire in Pittsburgh,
22 California on October 17, 2018, that Chevron claims was caused by a wire down from a PG&E power
23 line.

24 D. By Order dated June 20, 2020 [Docket No. 8053] (the “**Confirmation Order**”), the
25 Bankruptcy Court confirmed the *Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of*
26 *Reorganization Dated June 19, 2020* (as may be further modified, amended or supplemented from time
27 to time, and together with any exhibits or schedules thereto, the “**Plan**”). The Effective Date of the
28 Plan occurred on July 1, 2020. See Docket No. 8252.

1 E. Chevron timely filed a detailed Information Request Form (Claim Support ID Number
2 990407901156304) through the Prime Clerk portal that included detailed responses to questions
3 relating to the Proof of Claim.

4 F. On February 25, 2021, the Reorganized Debtors filed the *Reorganized Debtors' Sixty-*
5 *Sixth Omnibus Objection to Claims (ADR No Liability Claims)*" [Docket No. 10299] (the
6 "**Objection**"), which sought, inter alia, to disallow and expunge the Proof of Claim on the basis that
7 Chevron had failed to return a complete Information Form or otherwise respond to the Reorganized
8 Debtors with respect to the Proof of Claim.

9 G. On April 5, 2021, the Court entered an order disallowing and expunging the Proof of
10 Claim [Docket No. 10496] (the "**Proof of Claim Order**")

11 H. The Proof of Claim erroneously was included in the Objection due to a
12 miscommunication with Prime Clerk LLC, the Debtors' claims and noticing agent ("**Prime Clerk**").
13 The Reorganized Debtors acknowledge that Chevron filed a timely Information Request Form.

14 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, THROUGH THE**
15 **UNDERSIGNED, THE PARTIES JOINTLY REQUEST THE BANKRUPTCY COURT TO**
16 **ORDER, THAT:**

- 17 1. The Proof of Claim Order is set aside with respect to the Proof of Claim.
 - 18 2. Prime Clerk is authorized to update the official claims register for the Chapter 11 Cases
19 to reflect that the Proof of Claim is not disallowed and expunged.
 - 20 3. Both Parties reserve all rights with respect to the Proof of Claim.
 - 21 4. This Stipulation shall constitute the entire agreement and understanding of the Parties
22 relating to the subject matter hereof and shall supersede all prior agreements and understandings
23 relating to the subject matter hereof.
 - 24 5. This Stipulation may be executed in counterparts, each of which shall be deemed an
25 original but all of which together shall constitute one and the same agreement.
 - 26 6. The Bankruptcy Court shall retain jurisdiction to resolve any disputes or controversies
27 arising from this Stipulation.
- 28

1 Dated: April 8, 2021

Dated: April 8, 2021

2 KELLER BENVENUTTI KIM LLP

PILLSBURY WINTHROP SHAW PITTMAN LLP

3 /s/ Dara L. Silveira

/s/ Philip S. Warden

4 Dara L. Silveira

Philip S. Warden

5 *Attorneys for the Debtors and Reorganized*
6 *Debtors*

Attorneys for the Chevron Pipe Line Company

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